

B C TRANSPORTATION, Inc.

ICC MC 181451

DEPARTMENT OF TRANSPORTATION

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DOCKET SECTION

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February 25, 1999

Docket Clerk
U.S.D.O.T. Dockets
Room PL-40 1
400 Seventh St. S.W.
Washington, DC 20590-0001

ORIGINAL

Ref: Docket # FHWA-98-3656-J

Honorable Sirs:

In May, 1995, the owners and management of B C Transportation of Newark, N.J. had the honor of speaking before Undersecretary of Transportation, Mr. Michael Huerta and Miss Susan Gaskins of the Office of Motor Carriers. At that time, we presented safety related evidence of faulty and unsafe equipment provided by steamship lines to motor carriers for the transportation of freight.

At that time, and still today, we firmly believe that any **shipping** line that provides equipment to motor carriers for use on the highways is to be considered an equipment provider and is subject to the provisions of the Federal Motor Carrier Safety Regulations as they apply to equipment maintenance responsibilities. Further, as equipment providers, steamship lines that provide such equipment must be subject to inspections, audits and regulatory fines as adjudicated by the enforcement division of the Federal D.O.T.

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B C TRANSPORTATION, Inc.

B C Transportation vigorously supports revisions in Parts 390 and 396 of the F.M.C.S.R. to include equipment providers and to mandate responsibility to the providers for this inter-modal equipment. Additionally, B C Transportation, as an intermodal motor carrier, would welcome the opportunity to have a representative address the F.H.W.A. with respect to this extremely important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. L. Leef', written over a horizontal line.

Robert L. Leef
Vice President